



Mitchell E. Daniels, Jr., Governor
Rebecca S. Skillman, Lt. Governor and Secretary of Agriculture and Rural Development
Andy Miller, Agriculture Director

May 19, 2006

ATT: Trista Etzig
Docket Clerk, Fruit and Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Avenue, SW. Stop 0243
Washington, DC 20250-0243

Re: Docket No. FV06-1290-1 PR
Federal Register / Vol. 71, No. 76 pages 20353-20357

Dear Ms. Etzig:

I am providing comments in response to the April 20, 2006 proposed rule: *Specialty Crop Block Grant Program; Notice of Request for Approval of a New Information Collection*. Indiana has a rich agriculture heritage and is most often known for its production of commodity crops like corn, soybeans, and livestock. However, Indiana also has a strong specialty crop market, which includes ranking second in tomatoes for processing, first in mint, and fifth in fresh watermelon and cantaloupe.

This rulemaking is an important step in assuring that specialty crop block grant funds are used appropriately by states to enhance the competitiveness of specialty crops, with the ultimate goal of helping consumers improve their health by eating more fruits and vegetables.

The State of Indiana on behalf of its Specialty Crop producers wishes to highlight two major concerns with the proposed rule:

1. The rule is inconsistent with the clear intent of Congress when it passed the Specialty Crop Competitiveness Act in 2004 (Public Law 108-465) and will limit consumer choice by excluding the promotion of all types of specialty crops – including canned fruits and vegetables.

Section 1290.4 of the proposed rule: *Eligible grant project*, states that:

(a) To be eligible for a grant, the project(s) must enhance the competitiveness of specialty crops. **"Priority will be given to fresh specialty crop projects."**

The language giving priority to "fresh" is inconsistent with the authorizing legislation. Congress did not intend for one form of specialty crop to be given priority over others, nor to restrict state departments of agriculture from promoting a variety of specialty crops.



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2. The rule does not recognize the growing body of evidence on the benefits of canned fruits and vegetables.

The proposed rule is counter to federal guidelines on nutrition. The *Dietary Guidelines for Americans 2005* identifies canned foods as a way to help people consume the recommended daily variety and amount of fruits and vegetables. Nowhere in the Dietary Guidelines is preference given for fresh fruits and vegetables.

On behalf of Indiana's Specialty Crop Producers, I thank you for considering these comments. I urge USDA to issue a final rule that recognizes the importance of promoting all types and forms of healthy and nutritious specialty crops.

Sincerely,

A handwritten signature in black ink that reads "Mitchell Daniels".

Mitchell E. Daniels

Governor

State of Indiana

Cc: USDA Deputy Secretary Chuck Conner, Lt. Governor Becky Skillman, ISDA Director Andy Miller